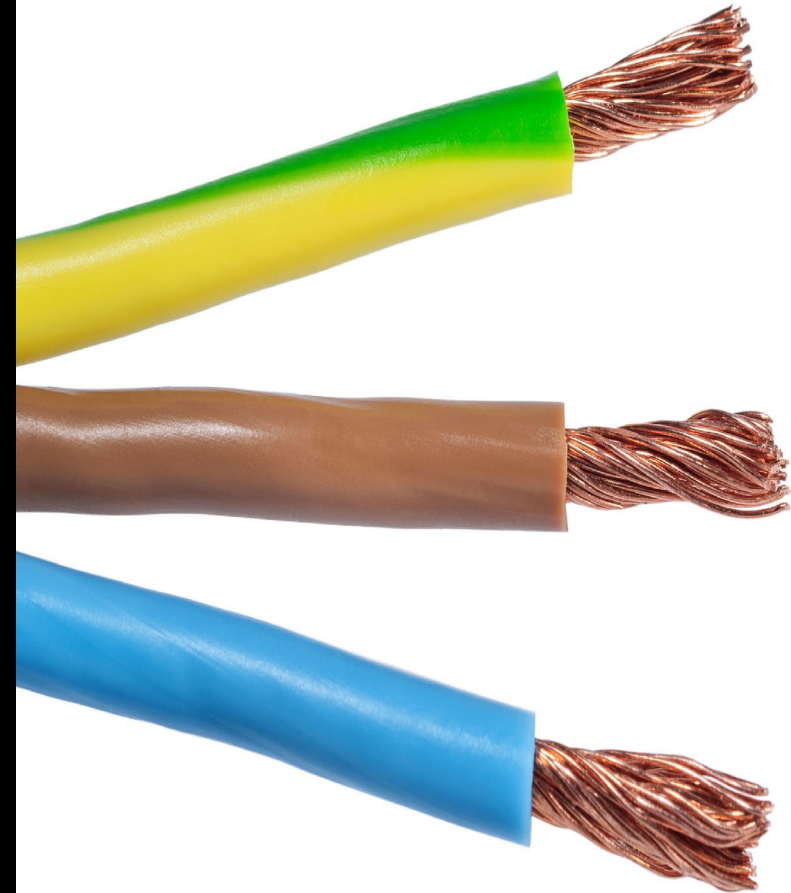


CONFLICT of EVERYTHING

**Unraveling the Web of
Conflict of Interest,
Conflict of Commitment
and Outside Activity
Disclosure into an
Automated System**



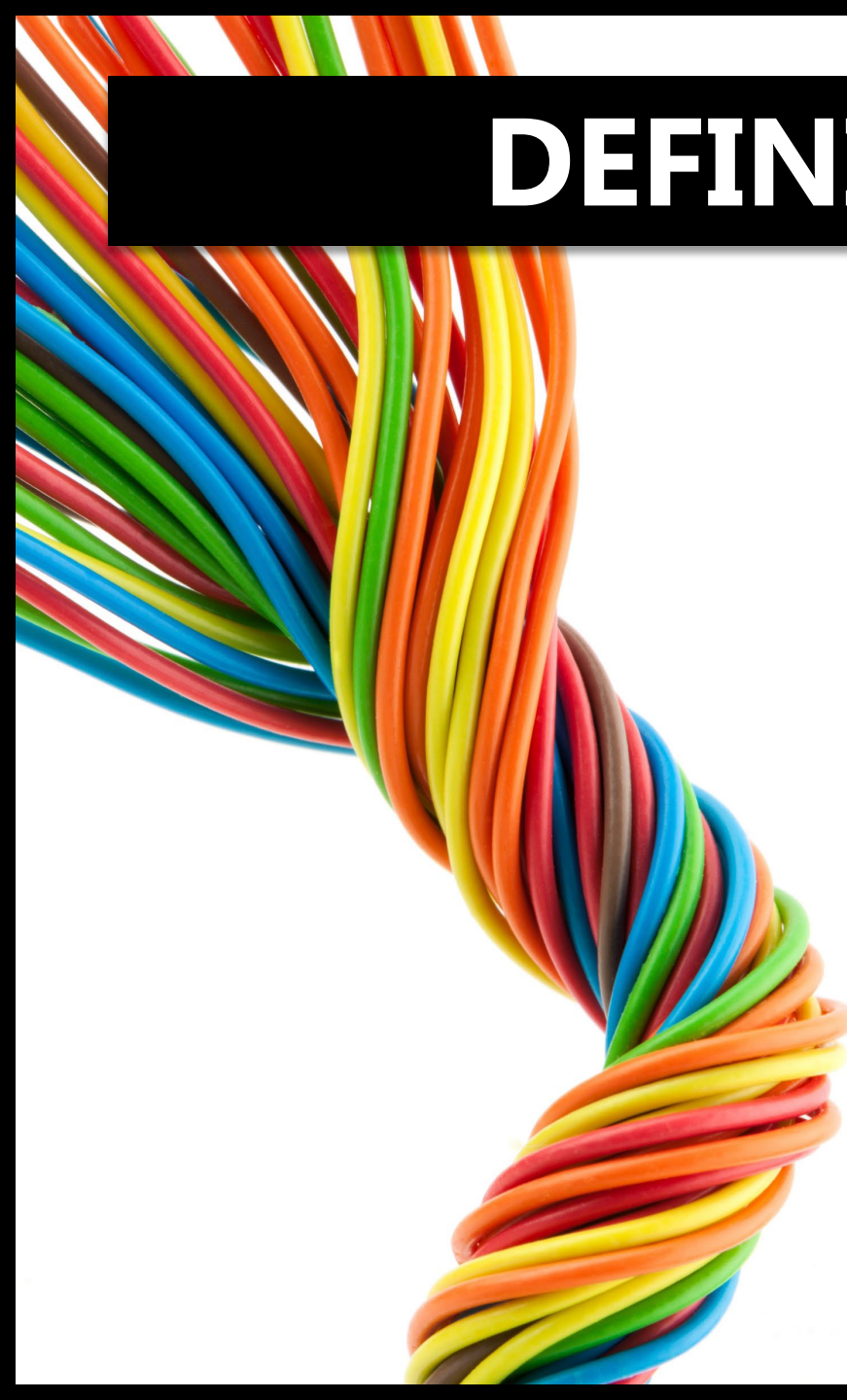
LEARNING OBJECTIVES



DEFINE Conflict of Interest, Conflict of Commitment and Outside Activity and the groups each topic impacts.

IDENTIFY nuance disclosure requirements and articulate key stakeholders needed at various points in the process.

DEVELOP a framework for planning and implementation of new software including strategic communication and institution-wide change management.



DEFINING THE CONCEPTS

Outside Activity

Conflict of Interest

Conflict of Commitment

Outside Activity

Policy Definition:

"An activity performed on or behalf of an outside entity that is similar in nature, practice, title or use of professional skills to the employee's role at the University, or regularly requires an employee's time and attention during their expected work hours."

What it Actually Means:

Anything that one does that is not for the University.

Employee Group:

- All faculty
- Exempt staff



Outside Activity

Examples:

- Board Membership: Helping govern or make high-level decisions for the organization.
- Consulting: Providing expert analysis on a research project.
- Employment: Holding a secondary job with an external organization or company.
- Management: Overseeing or managing operations or staff in a business setting.
- Ownership: Holding partial or full ownership in a business.
- Teaching: Serving on a faculty committee at another university.
- Volunteering: Volunteering extensively for a nonprofit organization, which takes time away from your University work.



Conflict of Interest

Policy Definition:

"A situation where financial or other personal or professional considerations compromise, or have the potential to compromise, an individual's objectivity, professional judgment, professional integrity, and/or ability to perform his or her responsibilities to the University."

What it Actually Means:

Anything that can affect one's judgment in carrying out their University responsibilities.

Employee Group:

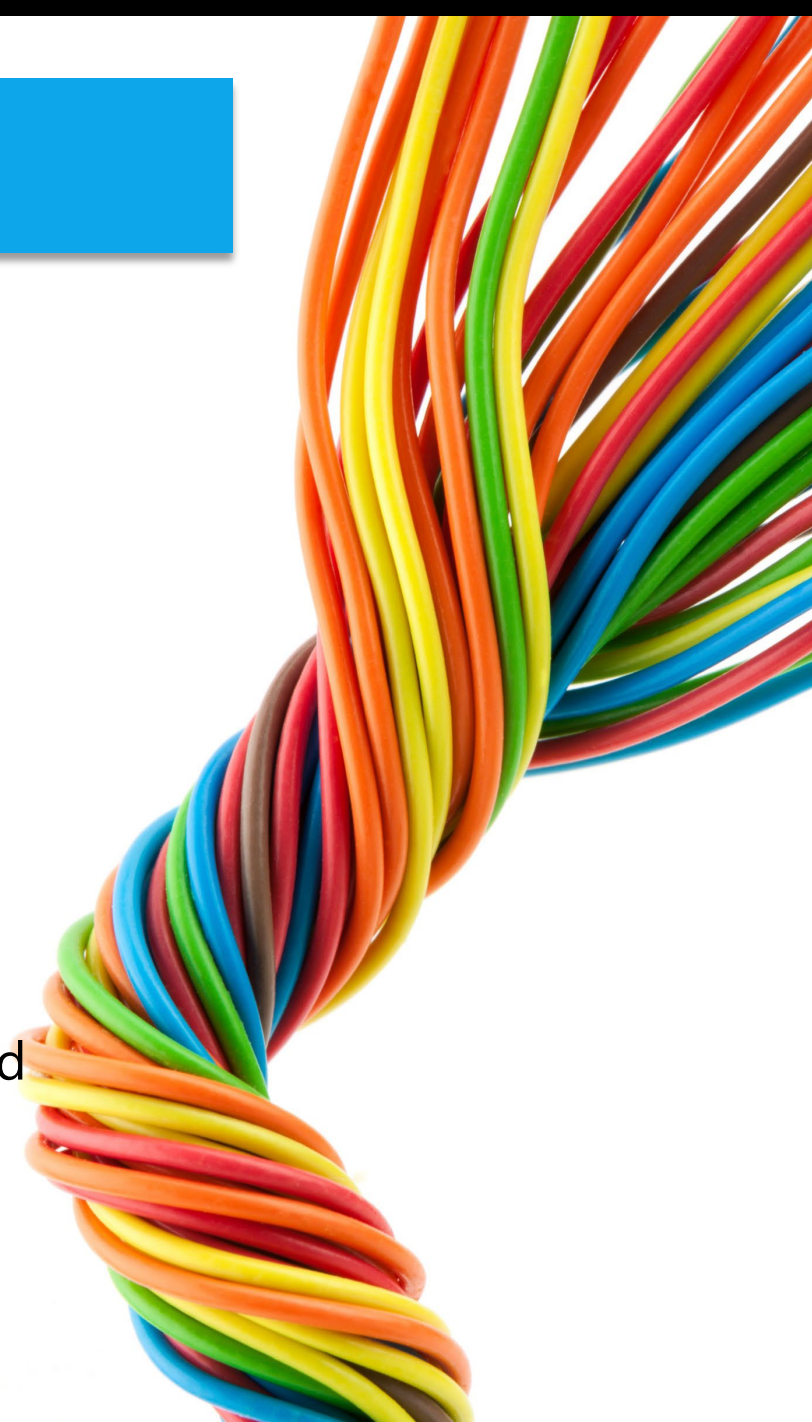
- Full-Time & Part-Time Faculty
- Full-Time & Part-Time Staff
- Students (undergraduates, graduate students, postdoctoral fellows)
- Visiting Faculty
- Postdoctoral Scholars



Conflict of Interest

Examples:

- A faculty member accepts royalties for the publication of his scholarly work.
- A faculty member accepts an honorarium for giving a lecture outside the University.
- A faculty member directs a student into a research area from which the faculty member may receive financial gain.
- A staff member serves as a director of an organization that does business with the University.
- A corporation asks a faculty member to sign a contract that would forbid publication of the faculty member's research findings.
- A staff member is selecting candidates for admission to the University and a family member applies for admission.



Conflict of Commitment

Policy Definition:

"A situation in which a faculty member engages in a professional activity whether paid or unpaid, that compromises his or her professional obligations to the University."

What it Actually Means:

Anything that can affect the time available for one to complete their University responsibilities.

Employee Group:

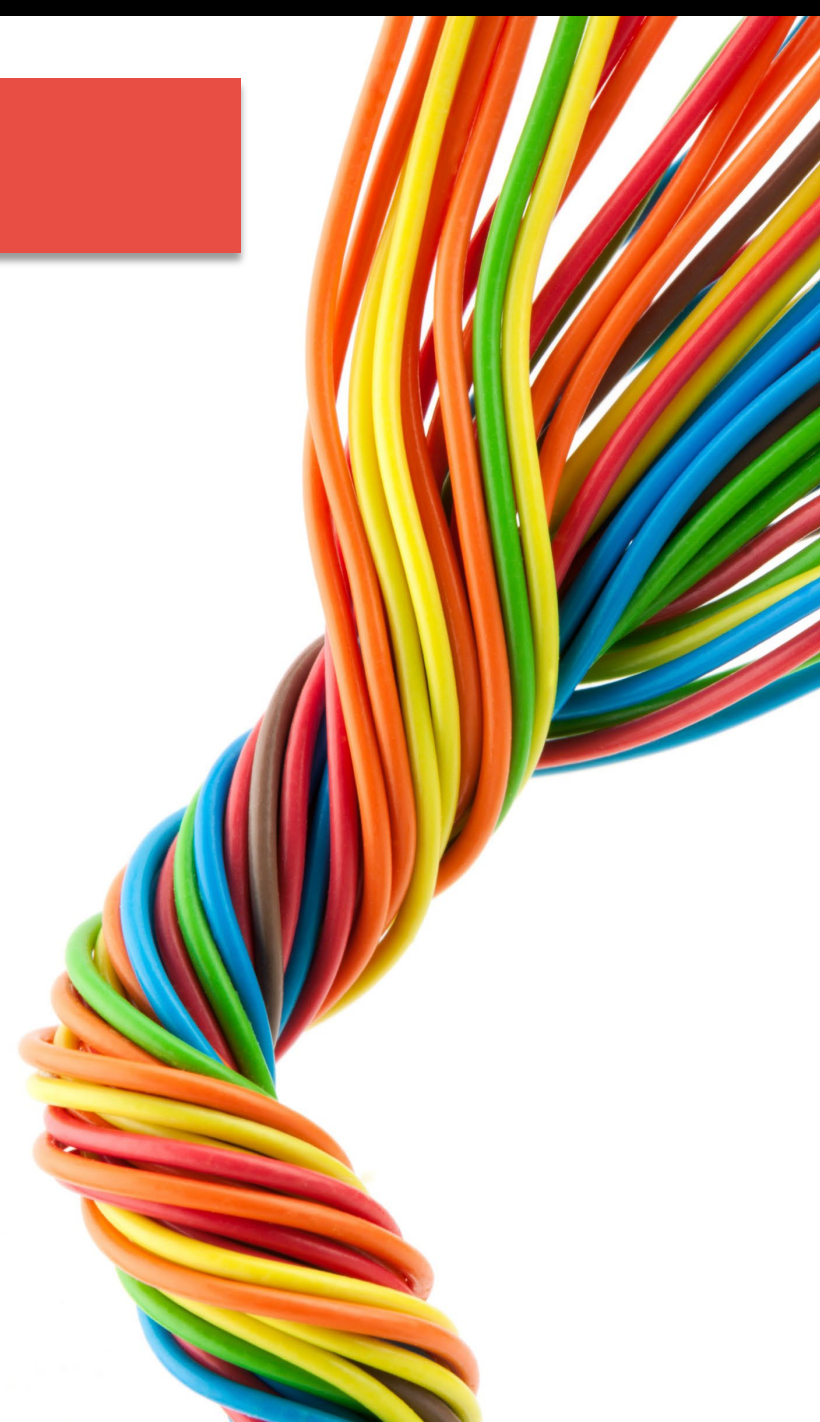
- All regular faculty
- All visiting faculty



Conflict of Commitment

Examples:

- Refereeing manuscripts in one's area of expertise.
- Attending professional meetings.
- Teaching at the University outside of a faculty member's home department.
- Serving on the editorial board of a learned journal.
- Consulting, teaching outside of the University, holding office in a scholarly or professional organization, editing a learned journal, and any other potentially compromising professional activities for more than one workday per month, but for less than seven workdays per month (on average).
- Working full-time outside of the University during any semester in which the faculty member is under contract to work for the University.



WHY NUANCE MATTERS

Different roles may have different standards for disclosure.

Minimizes risk for changes after implementation.

Standardization of conflict categorization and management strategies.

Balances compliance & academic freedom.



Why are we here?

Asking this aims to identify the **motivation, need or problem** that led to this effort in the first place.

Ask questions like:

- ✧ What prompted this need?
- ✧ What opportunity are we trying to capture?
- ✧ Why is it the right time to do this?



Why are we here?

Policy Changes:

- Updates to Conflict of Interest Policy.
- New Outside Activities Policy.
- Existing Conflict of Commitment Policy disclosure process never implemented.

Limitations of Current System:

- COI information entered into a single text box.
- No way to sort by Executive Office, Division, College, etc.
- No built-in reporting – must export into Excel, Tableau, etc.
- Communication outside of system only.

Change in Oversight / Management:

- Compliance taking over from General Counsel.

What are the goals?

Asking this aims to clarify the **ultimate objective** and ensure all involved know what **success** looks like.

Ask questions like:

- ✧ What problem are we solving?
- ✧ What are we trying to achieve?
- ✧ What does success look like?
- ✧ Who benefits, and how?



What are the goals?



Deploy in-depth training that is accessible and easy to understand.



Implement an enhanced disclosure system that allows for entry of individual activities without adding excess burden to the discloser.



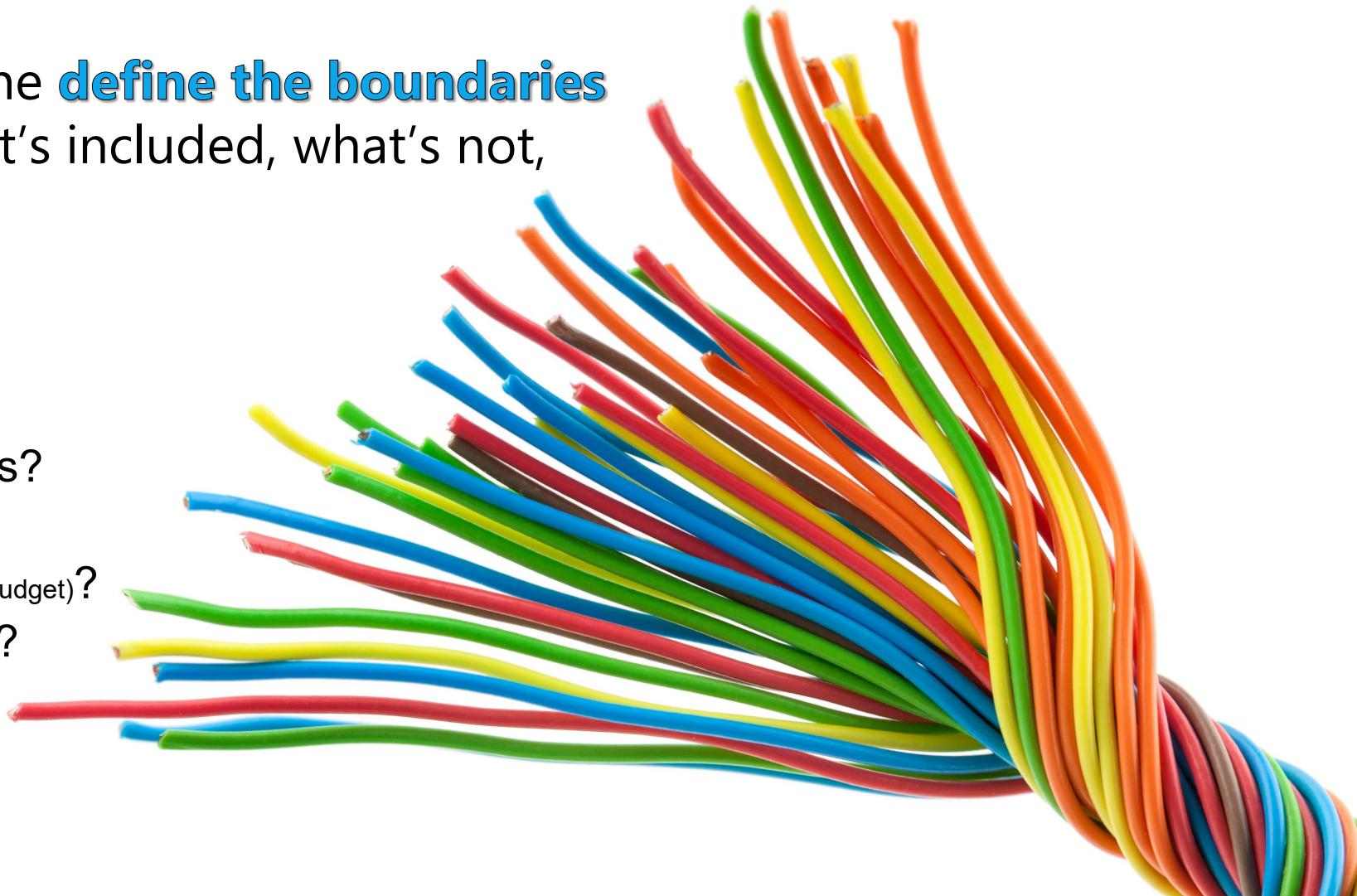
Provide consistent mitigation strategies for Designated Reviewers to employ when potential/perceived or actual conflicts exist.

What is the scope?

Asking this aims to clarify the **define the boundaries** of the project or task – what's included, what's not, and where the focus lies.

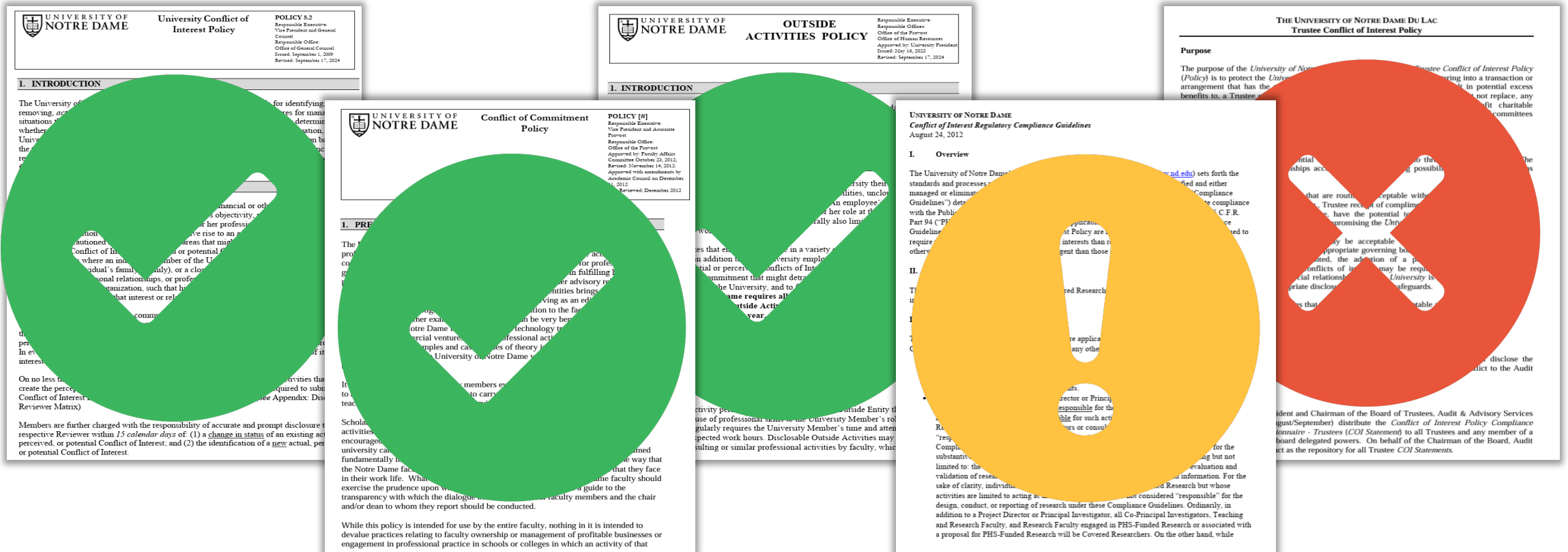
Ask questions like:

- ✧ What are the main deliverables?
- ✧ What is *not* included?
- ✧ Are there any constraints (time, budget)?
- ✧ Who are the key stakeholders?



What is the scope?

Use your policies to narrow scope and stakeholders.



What is the scope?

Deliverables:

- Functioning automated system including OA, COI, & COC.

Constraints:

- Must be completed by the next disclosure cycle.
- Need to utilize current disclosure housed in OnBase which IT manages.

Key Stakeholders:

- Audit & Advisory
- Information Technology
- General Counsel
- Information Technology
- Provost
- Research

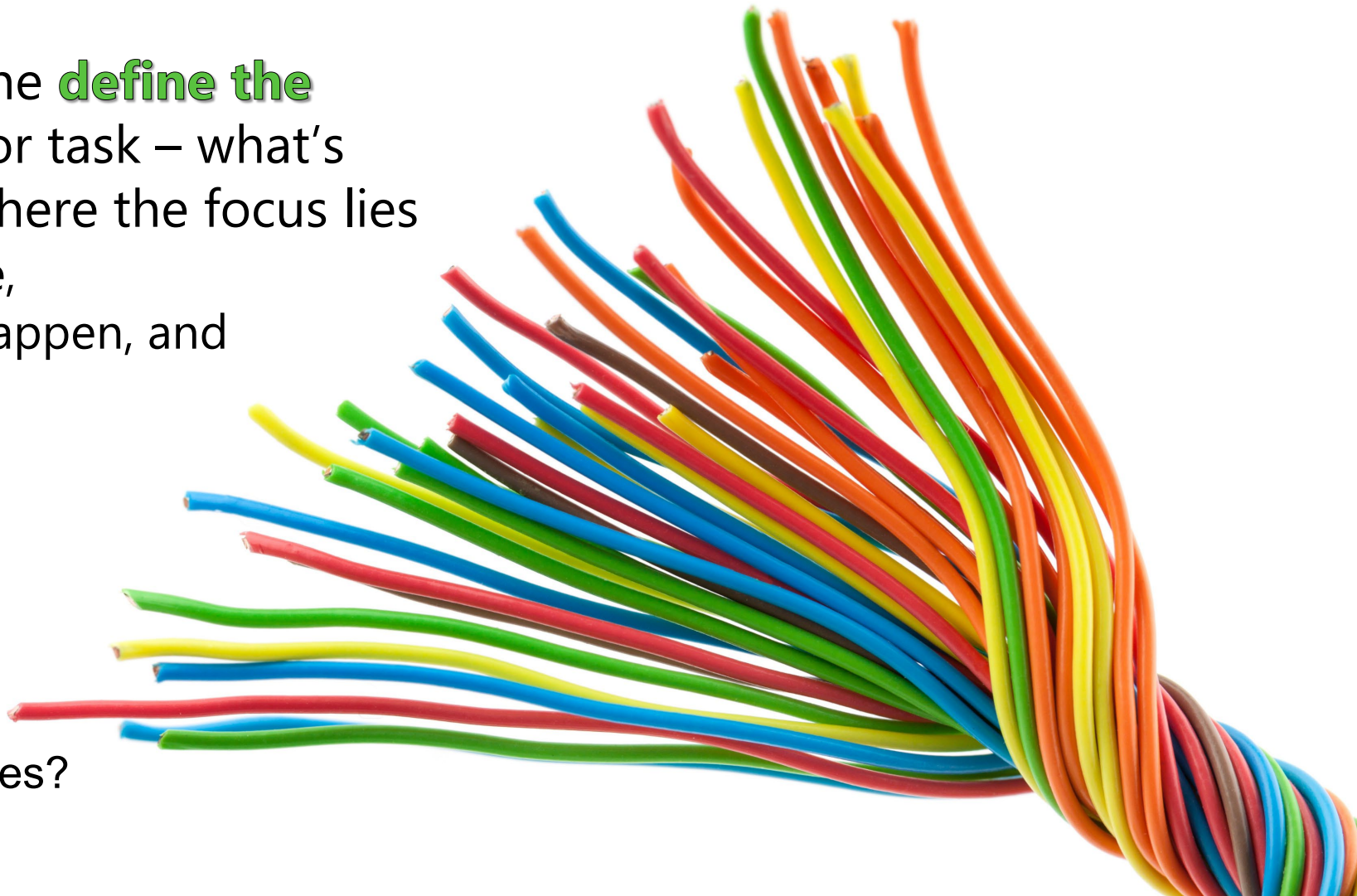
What is the timeline?

Asking this aims to clarify the **define the boundaries** of the project or task – what's included, what's not, and where the focus lies

- How long the work will take,
- When each part needs to happen, and
- What the deadlines are.

Ask questions like:

- ✳ Is there an ideal time to start / implement?
- ✳ What are the key milestones?
- ✳ Are there any external deadlines?



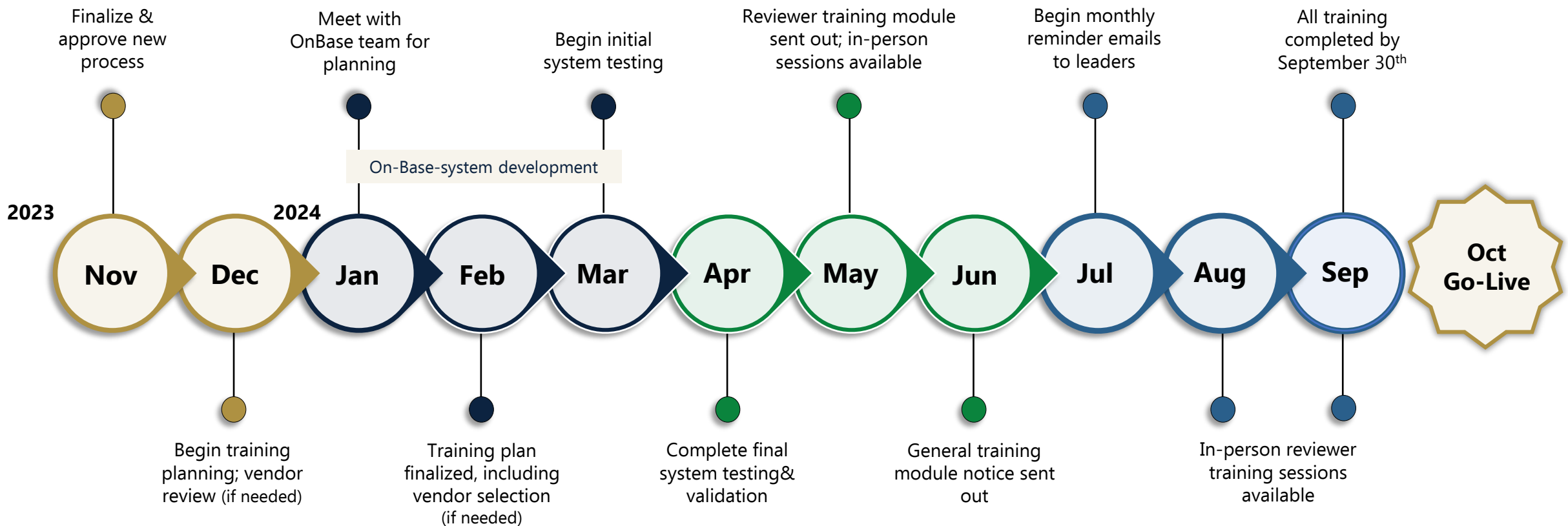
What is the timeline?

- Annual disclosure cycle occurs in October.
- No external or regulation-based deadlines.
- Willing to flex up to two months (December).

Key Milestones:

- ① User training
- ② Release of disclosure
- ③ Deadline (30 days)

What is the timeline?



What is the budget?

Asking this aims to understand **how much funding is available**, where it's going, and how to use it **effectively and responsibly**.

Ask questions like:

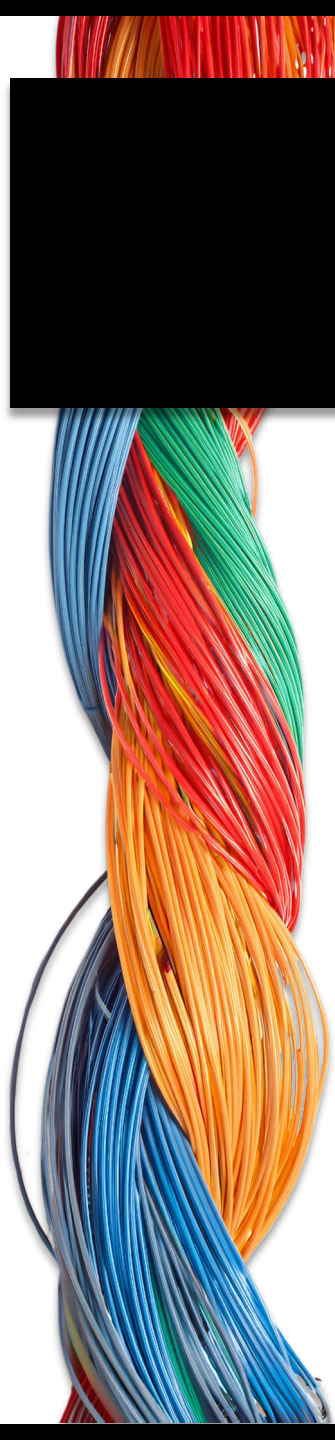
- ✧ What are the main cost areas?
- ✧ Are there any fixed costs or flexible areas?
- ✧ Is there a contingency buffer for unexpected expenses?
- ✧ Is there work that can be done internally?



What is the budget?

No funding planned / available.

- Expected to update / enhance existing disclosure.
- Considered "continuation of business" as University IT oversees the OnBase system.
- **What is the contingency plan?**



BUILDING, PLANNING & IMPLEMENTATION

TEAMWORK

makes the

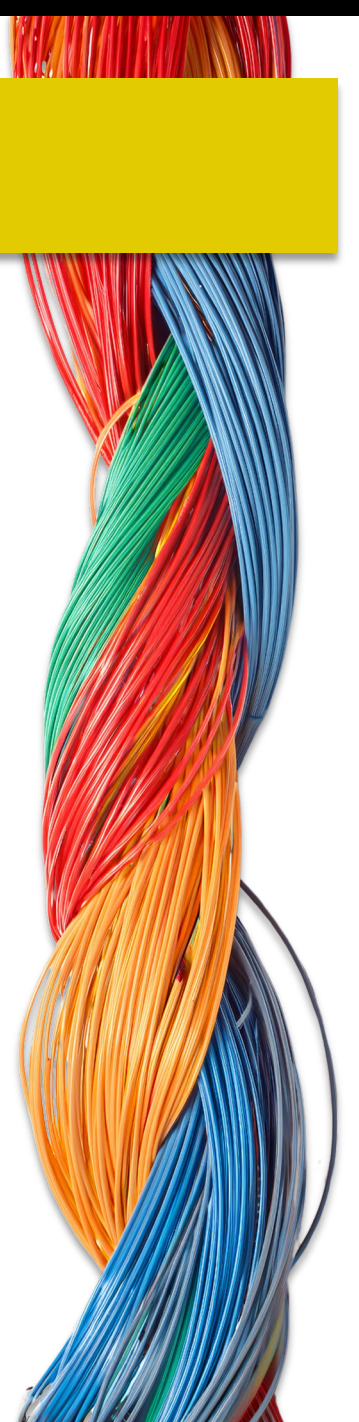
DREAM WORK

Mapping

Map out the desired workflow.

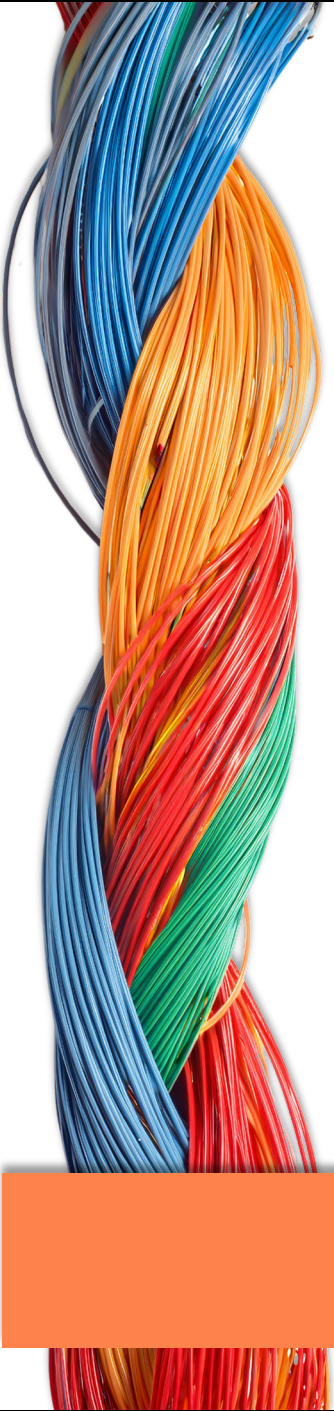
- Provide wireframes / process maps to the development team.
- Be specific in the expectations / goals.
- **Make sure everyone is in agreement on the minimal viable product and the due date!**

**Refer to the supplemental handouts for example mapping.*



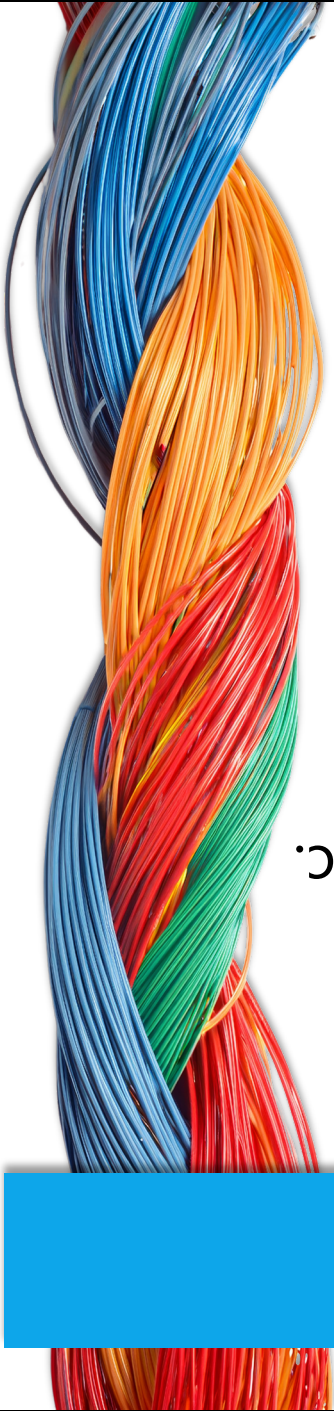
Acceptance Testing

- Include IT in all user acceptance testing (UAT) discussions.
- If you are using a third party software, ask upfront about user acceptance testing:
 - Who creates the testing scenarios?
 - Who is responsible for completing the testing?



Technical Support

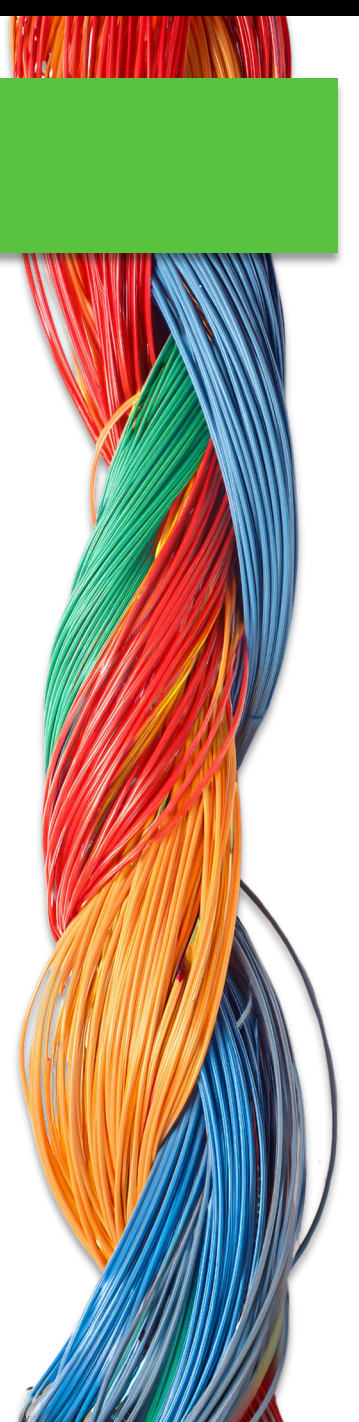
- Identify what technical support will be provided by the vendor or internal team and for how long.
- Establish workflow and expectations around any bug fixes, issues, etc. as well as the average turnaround time.
- Inform IT Help Desk of the project, as they can help:
 - Develop scripting for the Help Desk staff and
 - Identify access questions that may arise.



Change Management

Utilize the University's Change Management staff if available.

- **DON'T RECREATE THE WHEEL!!!**
- Provide "outside" viewpoints.
- Experienced with good and bad implementations.
- Knowledgeable about different avenues to get information to faculty and staff.
- Use the opportunity to update / refresh your website.
- Develop a collaborative, ongoing communications document.



Change Management

Conflict of Interest Policy



 Search this site

[Enter Disclosure System Here !\[\]\(c3d993ca47bfe2a953c700506ce31fa0_img.jpg\)](#)

Home

[Program Overview](#)

[Policies](#)

[Disclosure Process](#)

[Management Plans](#)

[Resources & Training](#)

[Frequently Asked Questions](#)

[Contact Us](#)

Welcome to the University's Conflict of Interest Program

Promoting Transparency and Integrity

Welcome to our Conflict of Interest Program! Here, we are committed to fostering a culture of transparency and ethical decision-making within our organization and beyond. Conflicts of interest can arise in various situations, and it's crucial to identify and manage them effectively to maintain trust and integrity.

Our Mission

In support of the University's mission, our goal is to educate and empower individuals to recognize potential conflicts, understand their implications, and navigate them responsibly. We strive to ensure that all members of our community adhere to the highest ethical standards.

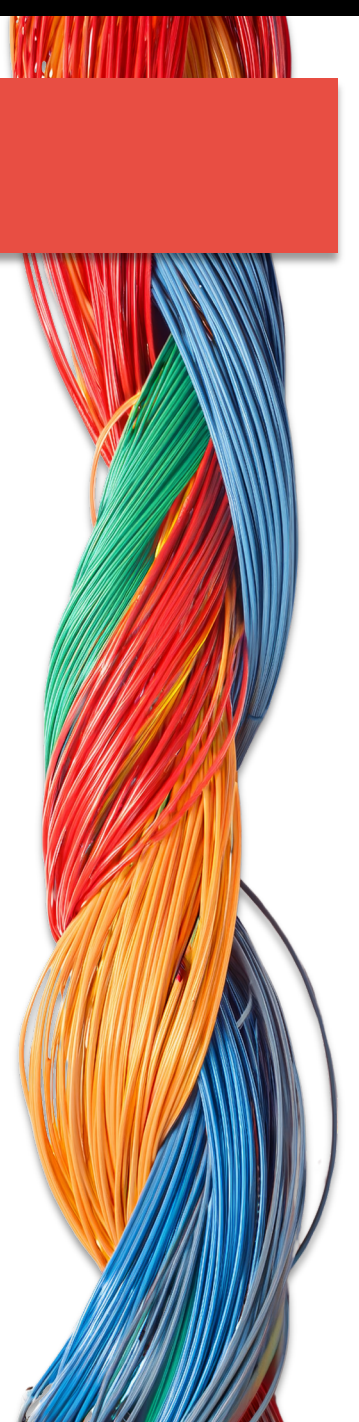
Key Components of Our Program

- **Awareness Training:** Participate in workshops and training sessions designed to help you recognize and address conflicts of interest.
- **Guidelines and Resources:** Access a comprehensive set of guidelines, FAQs, and case studies to enhance your understanding.
- **Reporting Mechanism:** Learn how to report potential conflicts safely and confidentially.
- **Support and Consultation:** Our team is here to provide guidance and answer any questions you may have about conflicts of interest.

Strategic Communication

Communicate **EARLY** and **BOLDLY**!

- Develop and utilize a shareable communications plan to stay on schedule
- Succinct, directed emails
 - Work with the University Communications team early in order to access email groups.
- Digital screens
- Printable flyers
- Include website URLs and QR codes



Strategic Communication

As the leaves change,
so must our commitment
to transparency!

New
**CONFLICT OF
INTEREST**
disclosure system

WHEN to Disclose:

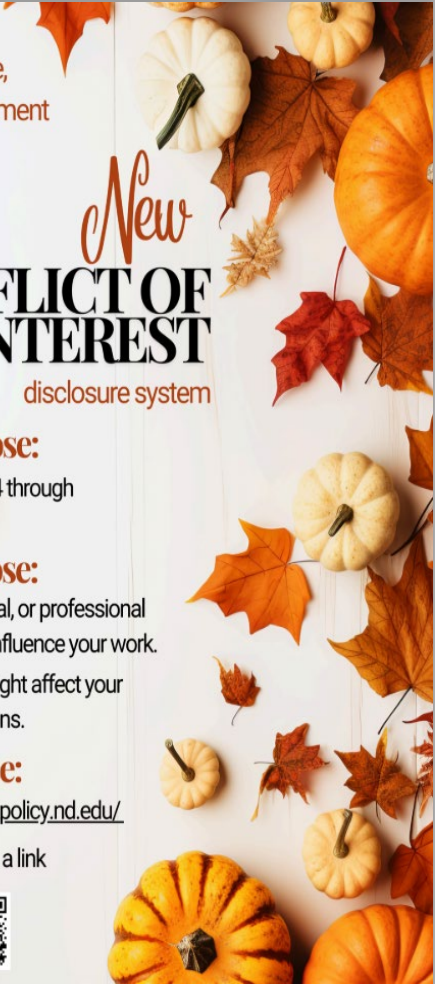
- Tuesday 10/22/2024 through
Friday 12/13/2024

WHAT to Disclose:

- Any personal, financial, or professional
interests that could influence your work.
- Relationships that might affect your
judgement or decisions.

HOW to Disclose:

- Go to <https://conflictpolicy.nd.edu/>
- Check your email for a link
- Scan now!



UNIVERSITY OF NOTRE DAME | AUDIT & ADVISORY SERVICES

**Time to complete
your annual
Conflict of Interest
Disclosure!**



Learn more:



Scan here for
more information.

Disclose:



Scan here to complete
your disclosure now.

UNIVERSITY OF NOTRE DAME | AUDIT & ADVISORY SERVICES

LAST CALL

**Deadline to complete your
Conflict of Interest is:**

Friday, January 31, 2025

Disclose:



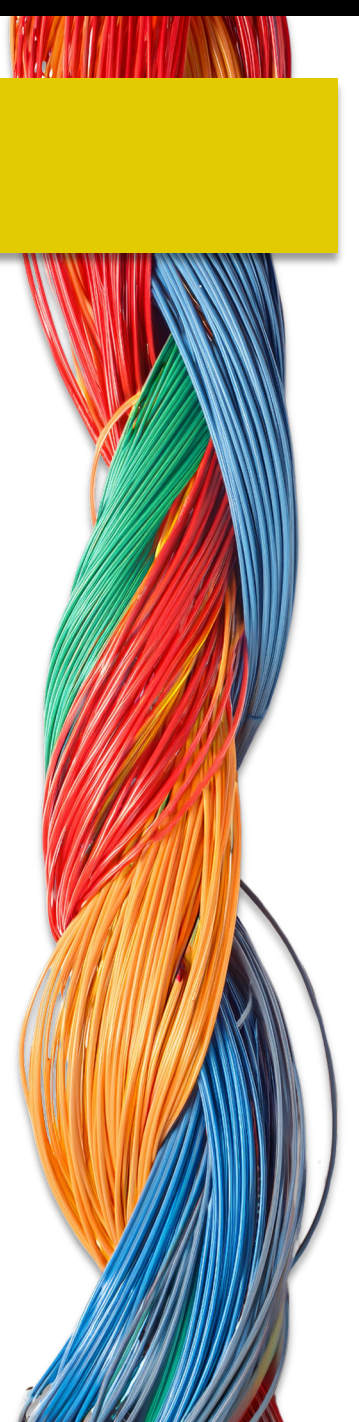
Scan here to
complete your
disclosure now.



Training & Support

Cater to **ALL** learning styles.

- Record on-demand training that walks a user through the software – make sure to do this for all user types.
- Develop detailed job aids specific to both the disclosure and review processes.
- Schedule virtual open office hours allowing employees to meet and discuss questions, challenges, etc.



Training & Support

Resources & Training

Click on the icons below to access specific resources.



Downloadable
Resources



Job Aids



On-Demand
Training



Example
Scenarios

Conflict of Interest Program Quick Guide

A quick guide for members required to submit a Conflict of Interest disclosure



WHEN to Report

- Faculty and staff are required to submit a disclosure **annually**.
- Disclosures must be updated within **15 calendar days** of any change or new conflict.
- New faculty and staff should submit a disclosure within **30 calendar days** of start date.



WHAT to Report

- Conflicts of Interest
- Outside Activities
- Conflicts of Commitment (faculty)



HOW to Report

- Go to <https://conflict.nd.edu/> to access the disclosure system.
- Scan the QR code here.



Disclosure Process

- The disclosure is routed to a Designated Reviewer to ensure any conflicts are categorized correctly.
- If the conflict needs management and oversight, the Designated Reviewer will work with you to develop a Management Plan.



For More Information

- **Reach out** to your Designated Reviewer
- **Visit** <https://conflictpolicy.nd.edu>
- **Email** conflicts@nd.edu

Training & Support

About

OUR PURPOSE

We are committed to fostering a culture of transparency and ethical decision-making within our organization and beyond. Conflicts of interest can arise in various situations, and it's crucial to identify and manage them effectively to maintain trust and integrity.

OUR MISSION

In support of the University's mission, our goal is to educate and empower individuals to recognize potential conflicts, understand their implications, and navigate them responsibly. We strive to ensure that all members of our community adhere to the highest ethical standards.

KEY COMPONENTS

- Awareness training
- Guidelines and resources
- Reporting mechanism
- Support and consultation



Contact Us

 conflictpolicy.nd.edu

 conflicts@nd.edu

 (574) 631-6616

 201 Planner Hall
Notre Dame, IN 46556

*Audit &
Advisory
Services*

*University of
Notre Dame*

CONFLICT OF INTEREST PROGRAM

Members of the Notre Dame community are dedicated to recognizing and avoiding conflicts of interest in their roles. They must also identify and manage any activities or relationships that could create the appearance of a conflict. The University believes that clear guidelines for reporting and managing actual, potential, and perceived conflicts will help faculty and staff uphold integrity.



Process

A disclosure is entered into the Novclusion system, accessed at conflictpolicy.nd.edu.

Once completed, the disclosure is submitted to the member's Designated Reviewer.

The Designated Reviewer ensures that disclosures are categorized appropriately. A determination is made whether a Management Plan is required.

- The Designated Reviewer will work with the member to develop a Management Plan, if needed.

Disclosures must be completed:

- Annually
- Within 15 calendar days of:
 - Change in status of an existing actual, perceived, or potential Conflict of Interest
 - Identification of a new actual, perceived, or potential Conflict of Interest
- Within 30 calendar days of employment start date

Conflict of Interest

- Simply put, a Conflict of Interest is anything that can affect your judgement in carrying out your Notre Dame responsibilities.
- Applies to any faculty or staff who are in a position to influence or commit University resources.

Outside Activity

- Simply put, an Outside Activity is anything that you do that is not for Notre Dame.
- Applies to all faculty and exempt staff.

Conflict of Commitment

- Simply put, a Conflict of Commitment is anything that can affect the time available for you to complete your Notre Dame Responsibilities.
- Applies to all regular and visiting faculty.

Training & Support

Downloadable Resources

Printable Resources

- [Conflict of Interest Disclosure Quick Guide](#)
- [Conflict of Interest Program Brochure](#)

(print double sided - flip on short edge)

Training Slides

- [General Overview of Notre Dame's Conflict of Interest Program](#)

Resources & Training

Click on the icons below to access specific resources.



Downloadable
Resources



Job Aids



On-Demand
Training



Example
Scenarios

Example Scenarios

Here are several examples of conflict of interest situations/activities, their correct categorization and corresponding mitigation step contained in the Management Plan:

Click [here](#) for category classification details.

Situation	Category	Management Plan
1) A staff member is to take part in the evaluation and selection of a supplier from a number of bidders. One of the bidding companies is operated by the staff member's family member.	C	The staff member does not take part in that or any other supplier evaluation/selection that involves her family's company.
2) A faculty member accepts royalties for the publication of his scholarly work.	A	No management plan needed.
3) A faculty member is conducting sponsored research on a product developed by a company for which the faculty member is a consultant.	B	The faculty member discloses her relationship with the company to the sponsor of the research and in any published research results for that product.
4) A staff member serves on the board of a local community organization.	A	No management plan needed unless the organization seeks to do business with the University.
5) A staff member would like to hire his spouse as a consultant to the University.	C	The staff member does not make the hiring decision, but instead refers the hiring decision to a supervisor.
6) A faculty member directs a student into a research area from which the faculty member may receive financial gain.	B	The faculty member informs the student about the possible financial gain. Another faculty colleague makes an objective judgment about whether this research is in the student's scholarly best interest.
7) A staff member has a financial stake in a company that does business with the University. The staff member has the opportunity to make a decision for the University that will impact that business.	C	The staff member is excluded from participating in this or any other decision on behalf of the University with regard to that business.
8) A staff member owns stock in a company that does business with the University. The staff member does not have any influence over University decisions regarding that company.	A	No management plan needed unless the staff member is given authority to influence University decisions regarding the company.

Job Aids

Click on the icons below for task-specific job aids.



Disclosure Job Aids



Reviewer Job Aids

On-Demand Training



General Overview of Notre Dame's Conflict of Interest Program

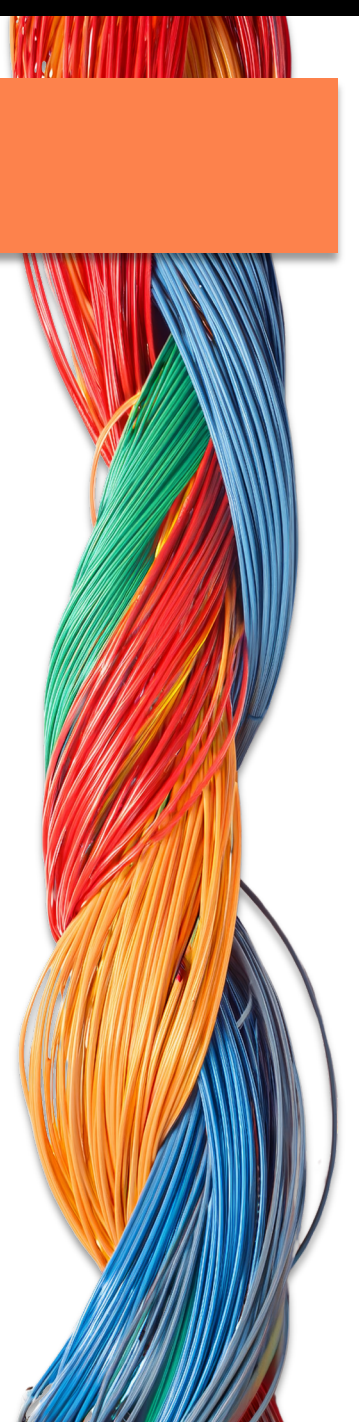
This training is intended to be a brief overview focused on the key points and insights important to the Conflict of Interest program. Faculty and staff are highly encouraged to read the policies discussed in the training for additional knowledge. The slides are available for download [here](#).

This General Overview training is 14 minutes and includes:

- Introduction
- Outside Activities Policy
- Conflict of Commitment Policy
- Conflict of Interest Policy
- Disclosure and Management
- Resources

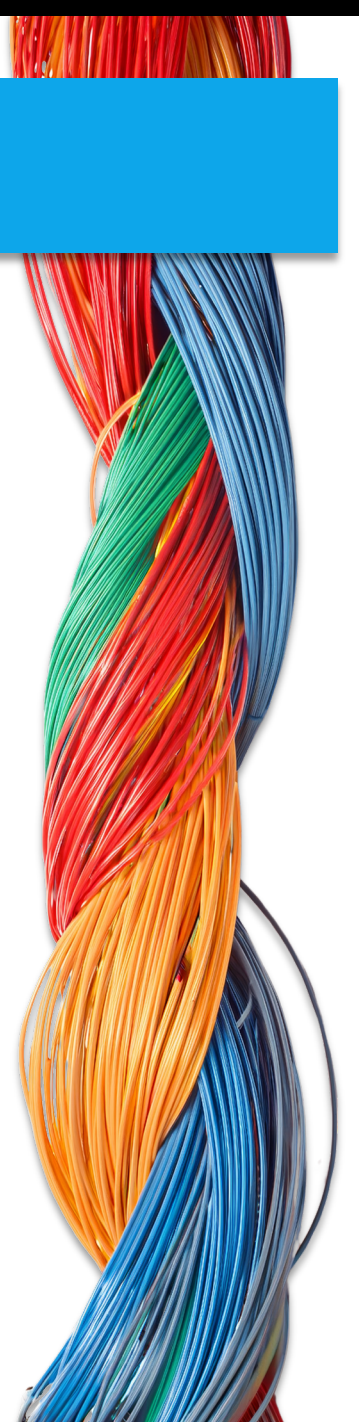
Implementation

- A phased roll-out is ideal.
- Identify the first departments and communicate in advance – create a sense of excitement about being the first to try the new system.
- Consider issuing a small number of disclosures one day, then taking the next two days “off” to allow for issues or bugs.
- **Expect imperfection!**



Post-Implementation

- **The work isn't done!**
- Continue team meetings post-implementation to discuss any issues.
- Work through challenging cases as a team to establish consistency.
- Establish timeline for delinquency notifications and when to escalate to supervisors.
- Be a lifeline for reviewers but don't do the work for them.



CELEBRATE THE WIN

Win!



Automation

- Automatic feed from HRIS – new users get tasked day after entered
- Ability to schedule assignment of disclosure to individuals or groups
- Task assignments for disclosers, reviewers, approvers, etc.
- Escalating notices to supervisors for delinquent disclosures
- Automated signature / approval process for Management Plans
- Integration to Research's Current & Pending system



Reporting

Sorting:

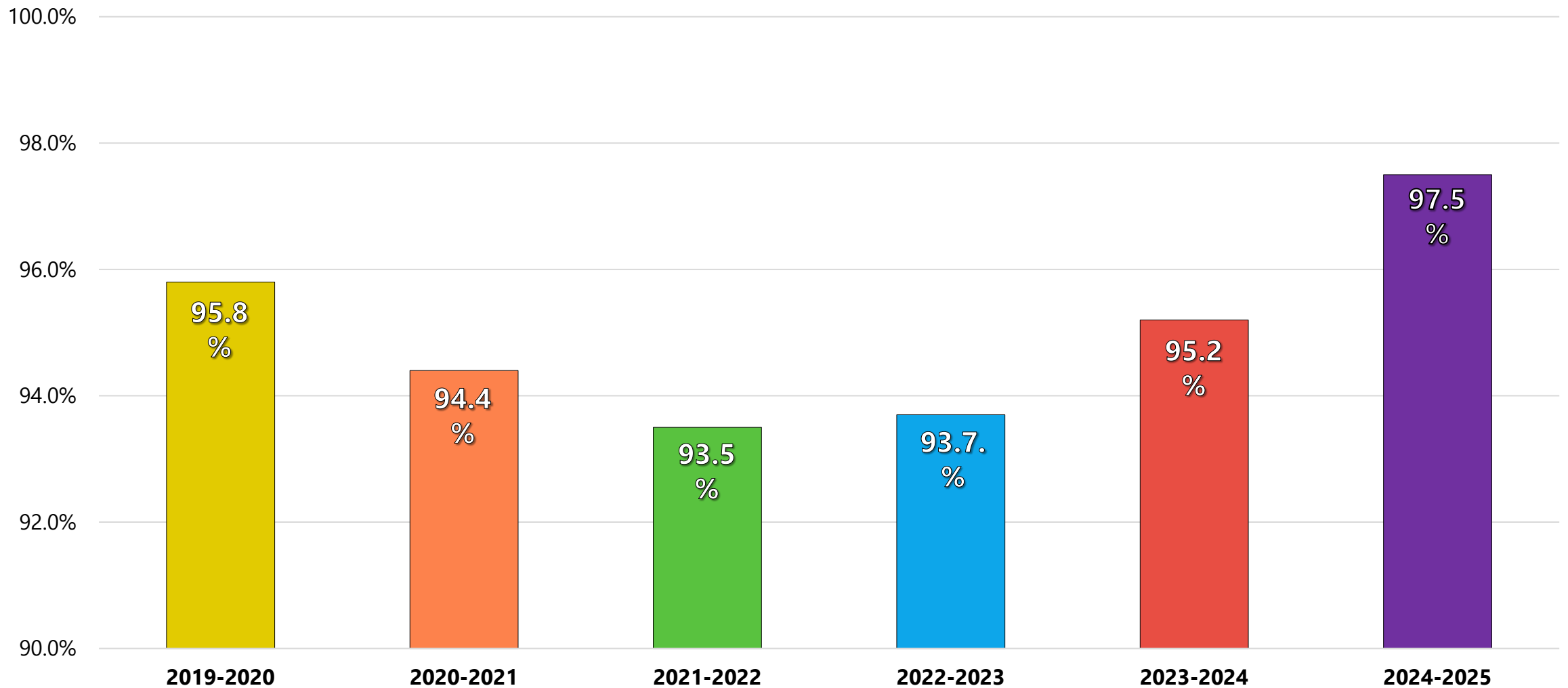
- College/Department
- Department/Section
- Status
- Reporter
- Supervisor
- Has Active Management Plan

Ad-Hoc Reports:

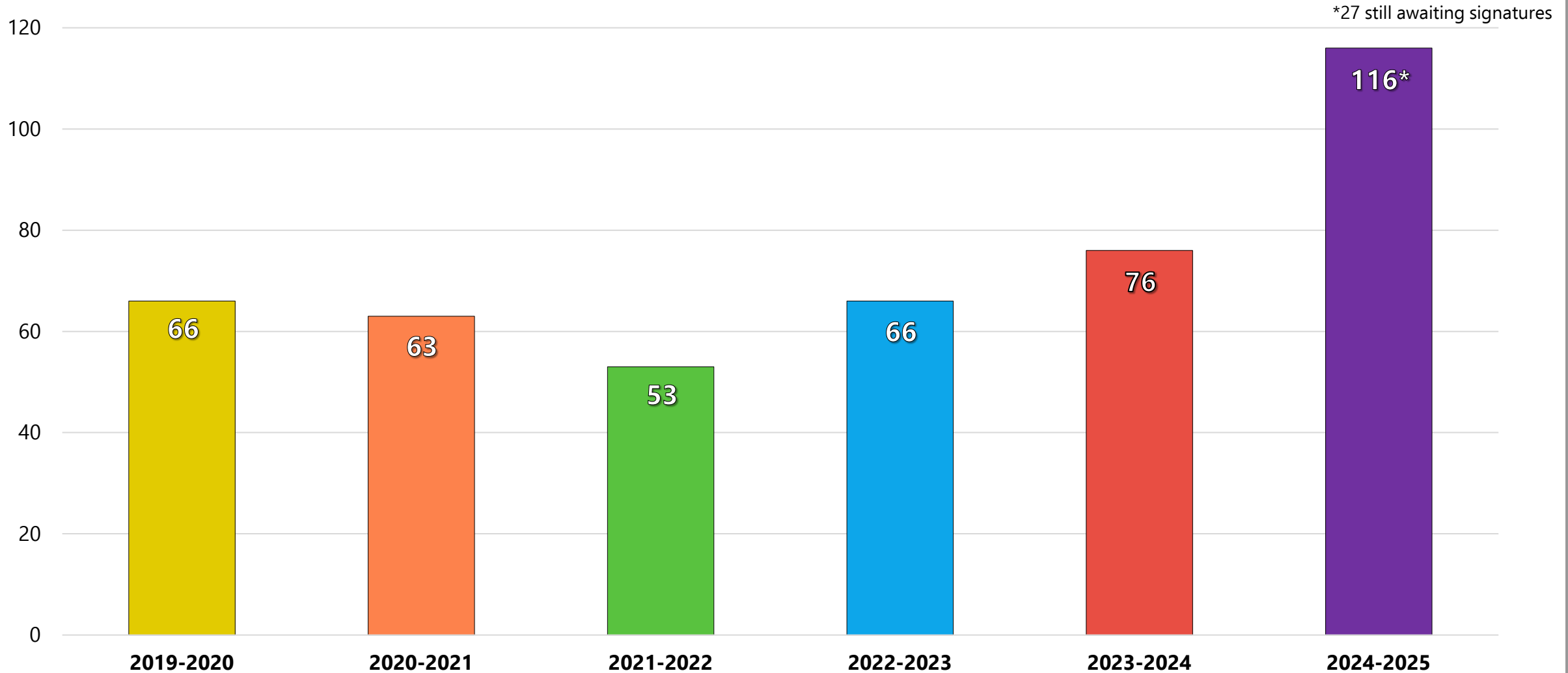
- Outside Entities
- Outside Activity
- Equity
- Intellectual Property



Overall Completion Rate

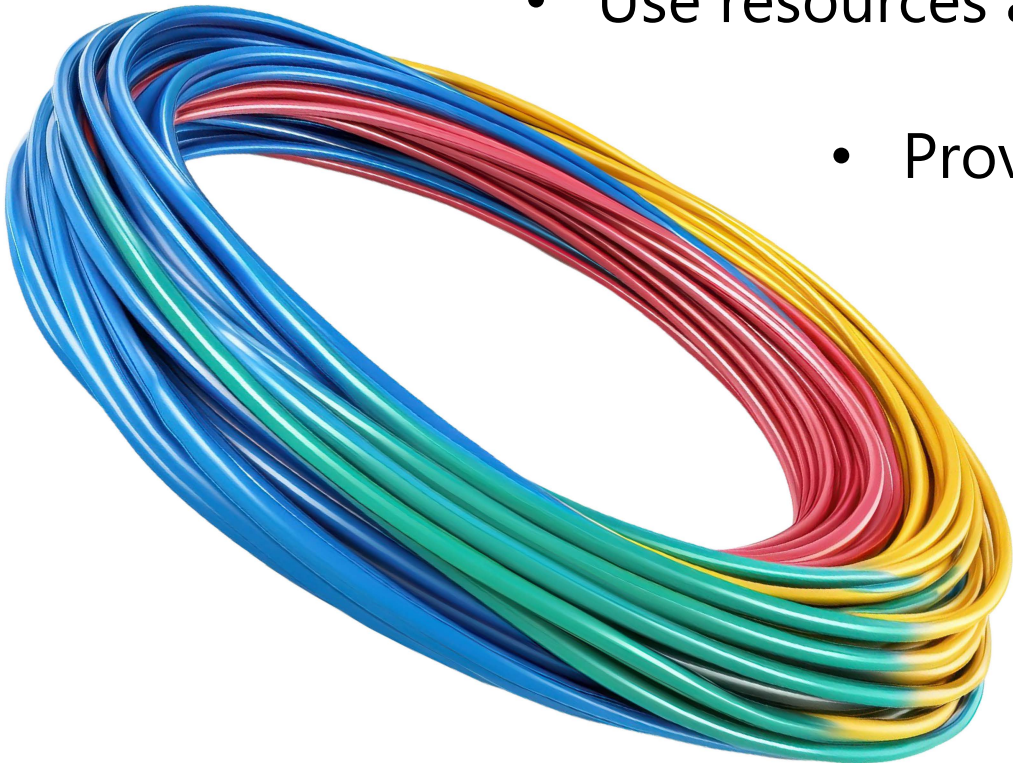


COI Management Plans



Final Thoughts

- Define your key concepts and identify key stakeholders early.
- Use resources across the University throughout the process.
- Provide easy to use tools / references for users.
- Celebrate the wins and learn from the “losses.”
- Have a contingency plan ... or two!





**Thank
You!**